

IN THE DISTRICT COURT
FOR THE COUNTY OF PITKIN
STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

VS.

THEODORE R. BUNDY,

Defendant.

MOTION TO IMPROVE
DEPENDANT'S CONDITIONS
OF CONFINEMENT IN THE
BARTFIELD COUNTY JAIL

Comes now the Defendant, pro se, Theodore F. Bundy, and states as follows:

1. Since April 11, 1977, defendant has been confined in the Garfield County Jail in Glenwood Springs, Colorado.

During this period he has been maintained in a kind of custody best described as maximum security isolation. The conditions have adversely affected his health, well-being, and state of mind. A more serious impact may be ~~seen~~ seen should defendant's strength and health reach levels too low for him to effectively conduct his own defense.

2. The circumstances and conditions of his confinement are violative of his Fourteenth Amendment right to be free from arbitrary restriction of liberty. In the same vain, his treatment contradicts the notion that he is innocent until proven guilty since he is presently being subjected to punishment without due process of law. Finally, the conditions to which defendant is currently subject amount to a breach of the Eighth Amendment prohibition against cruel and unusual punishment.

Motion To Improve Conditions

Page 2.

3. Defendant's particular grievances regarding his conditions of confinement are innumderated in the Affidavit In Support of this motion.

Wherefore, Defendant moves the court for an order directing the Garfield County Sheriff, Ed Hoge, to make the following improvements and supply the following provisions without delay:

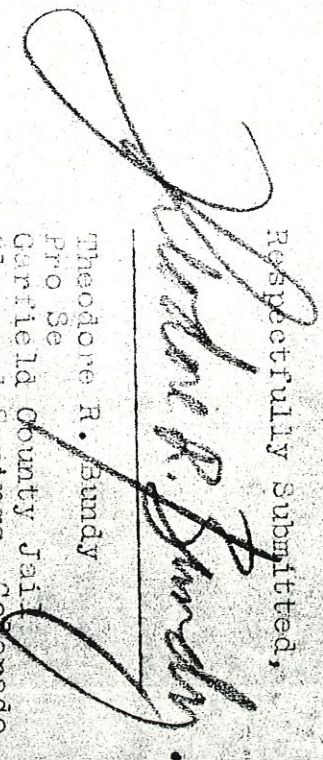
1. A daily diet which includes:
 - (a) lunch,
 - (b) at least 2,600 calories,
 - (c) Recommended Daily Allowances (RDA) of protien, carbohydrates, fats, vitamins, and mineral
(as established by the National Academy of Sciences.)
2. Sheets, pillow, pillow case and clean blanket.
3. Provision each day of a mop, broom and toilet cleaning material.
4. A writing and typing table.
5. At least two one-hour exercise periods each week permitted defendant outside his cell.
6. At least one, one-hour exercise period outside the jail in the fresh air and sunlight.
7. An end to the policy ordering other inmates not to talk to the defendant and punishing them if they do.
8. A battery powered radio to be supplied by defendant.
9. Multi-vitamin supplements and probien tablets to be supplied at defendant's expense.
10. Defendant be taken for a hair cut by a professional barber at his own expense immediately, and there - after provision be made for a hair cut once a month.

Motion To Improve Conditions

Page 3.

Dated this 9th day of May, 1977

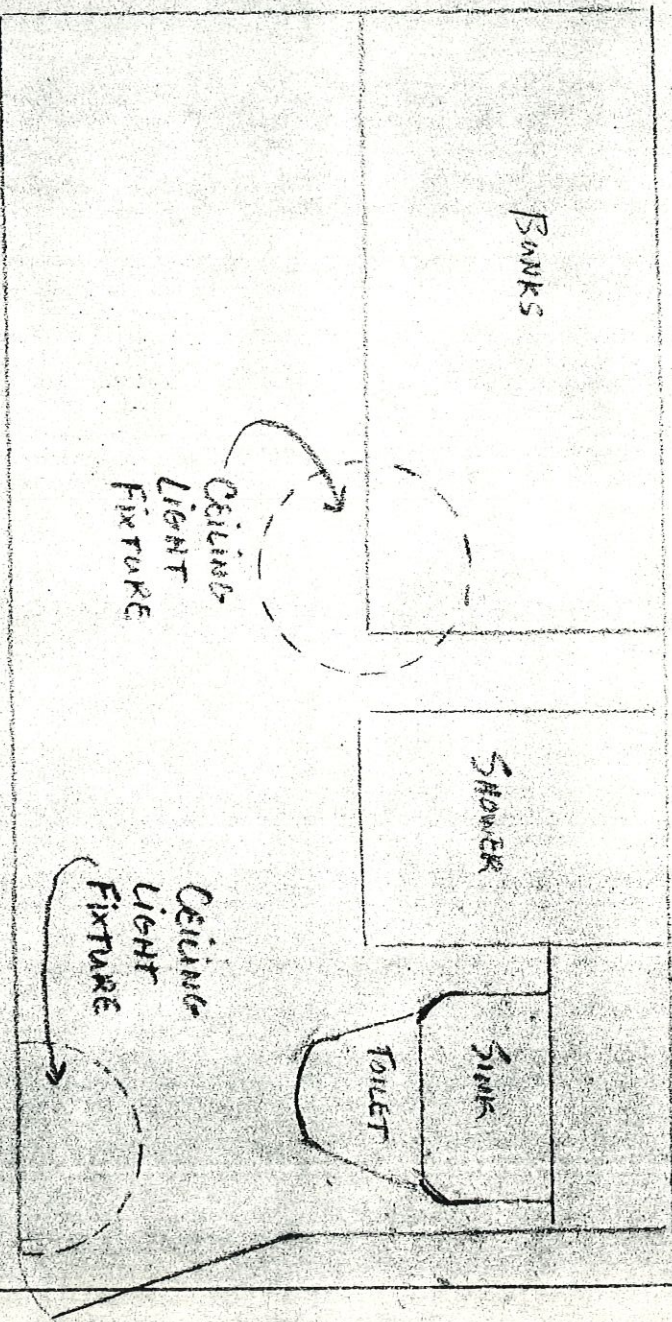
Respectfully Submitted,


Theodore R. Bundy
Pro Se
Garfield County Jail
Glenwood Springs, Colorado

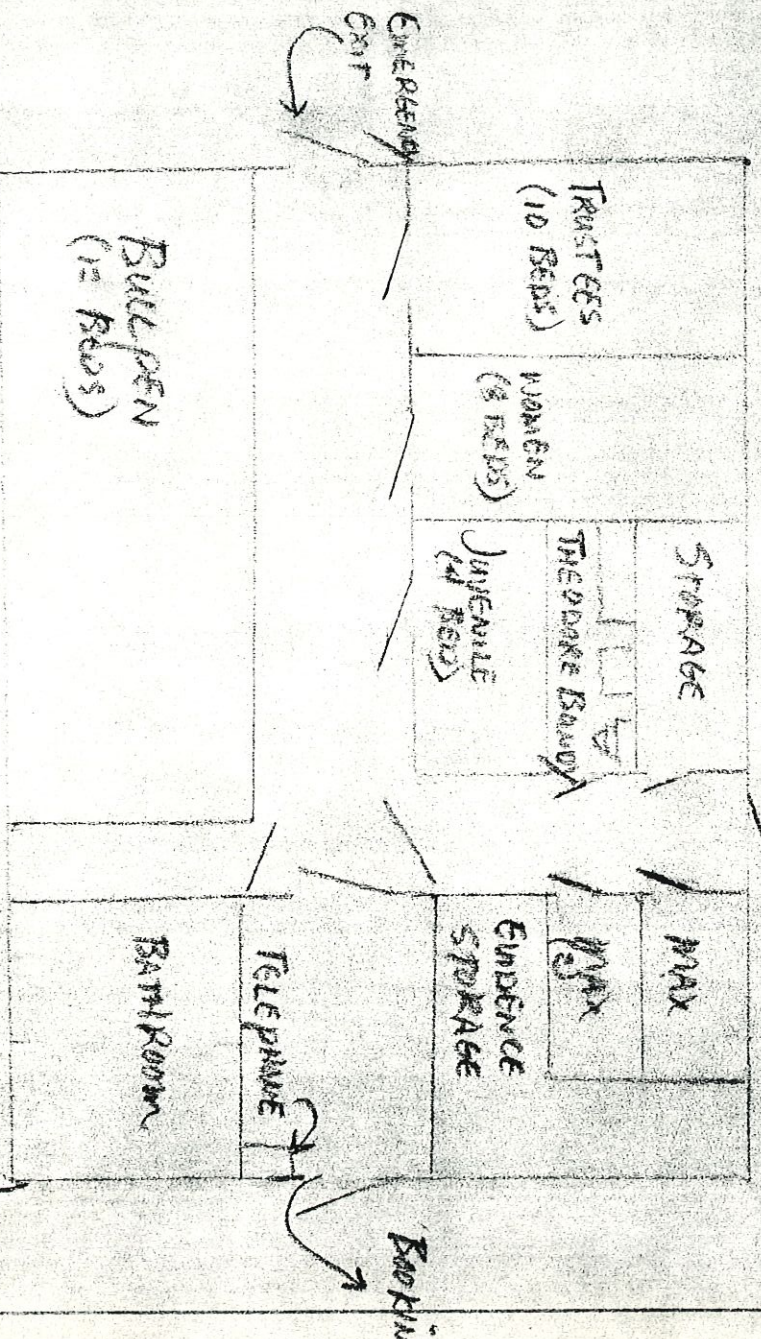
Motion to Improve Conditions
Exhibit #1

DEFENDANT'S Cell

GARFIELD County Jail



KITCHEN



Approximate Layout of Garfield County Jail

1-4-78
6:00 PM

DO NOT DISTURB

I HAVE BEEN
FEELING SICK AND
NEED THE SLEEP.

THANKS

TED

IN THE DISTRICT COURT

IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. C-1616

FILED IN DISTRICT COURT
PITKIN COUNTY
COLORADO

MAY 23 1977

SHARLEY W. DILLIS, CLERK

THE PEOPLE OF THE
STATE OF COLORADO

vs.

THEODORE ROBERT BUNDY

ORDER

DEPUTY

)
)
)
)
)
)

The Court having heard the Defendant's motion, hereby

orders that with respect to the application for a different daily diet, the Court orders that the defendant be taken to a doctor for a physical examination relating to his present health and maintenance of his health while in the Garfield County Jail.

The examining physician is to be someone not personally connected with law enforcement. Charles Leidner, Deputy Public Defender shall review the name of the physician in order to bring to the attention of the Court any problems with regard to the physician's relationship to any of the parties in the above entitled case. The physician is to review the documents admitted into evidence in the hearing heard in Pitkin County District Court May 23, 1977, with regard to the defendant's diet. This is to include the Garfield County Sheriff's Office list of meals and the food chart prepared by the defendant. The doctor is to be advised as to the condition of the defendant's confinement. The doctor is to evaluate whether the defendant's present diet is adequate to maintain his health at a minimum level and to engage in intellectual activities that are necessary for the preparation of his defense. The doctor is further to evaluate the defendant's request for exercise periods and any action by the Court with regard to exercise periods is deferred until the doctor's report is received. The examining doctor shall submit a report to the Court with a copy to the District Attorney's Office and include a recommendation as to how frequently it is appropriate to see the defendant to evaluate his health and energy level.

The Garfield County Sheriff's Office shall be required to make sure the defendant's blankets are kept in a reasonable state of

cleanliness at all times.

The defendant shall be issued a mop, broom and toilet cleaner at his request but no more frequently than every two days.

The defendant shall be allowed to have a battery powered radio in his jail cell to be provided by the defendant.

The defendant shall be allowed vitamin supplements to be provided at the defendant's expense.

The defendant shall be allowed a hair cut once a month. The timing of the hair cuts to be left at the discretion of the Sheriff.

So Ordered this 23rd day of May, 1977.

BY THE COURT


District Court Judge

IN THE DISTRICT COURT IN AND FOR THE
COUNTY OF PITKIN AND STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE STATE
OF COLORADO,

VS.

THEODORE R. BUNDY,

Defendant.)

CERTIFICATE OF

MAILING

I hereby certify that on the 2nd day of May, 1977,

I mailed, in properly addressed and stamped envelopes, by United States Regular mail a copy of MOTION TO EXCLUDE THE PUBLIC FROM PRETRIAL EXCLUSIONARY (SUPPRESSION) HEARINGS; MOTION TO CONTINUE FILING DATES AND HEARING DATES FOR PRE-TRIAL SUPPRESSION MOTIONS; MOTION FOR THE APPOINTMENT OF AN EXPERT IN HUMAN HAIR ANALYSIS AND FOR ESTABLISHMENT OF A PROCEDURE TO GATHER AND TEST HUMAN HAIR SPECIMENS; MOTION FOR DISCRETIONARY DISCLOSURES; MOTION FOR THE PUBLIC DEFENDER TO DISCLOSE CASE FILES AND DOCUMENTS TO DEFENDANT; LETTER TO JUDGE LOHR and DESIGNATION OF PARTIES FOR MAILING LIST OR CERTIFICATE to each of the following persons at the address noted, to-wit:

Public Defender
State of Colorado
1575 Sherman Street
Denver, Colorado 80203

Mr. Thomas B. Kelley
Yegge, Hall and Evans
1340 Denver Club Bldg.
Denver, Colorado 80202

Charles G. Leidner, Esq.

Public Defender
310 Ninth Street
Glenwood Springs,
Colorado 81601

District Attorney's Office
506 East Main Street
Aspen, Colorado 81611

Mr. John Kane
Attorney at Law
United bank Building
1700 Broadway
Denver, Colorado 80203

Shirley W. Dills
Clerk of the District Court

By Michael J. McClellan

168 pages Xerox Copy

Theodore Bundy
Garfield County Jail

Re: Supplies

Date: 5/11/77

- ✓ 1. One doz. $8\frac{1}{2}$ x 14 legal note pads
/hole
- ✓ 2. Two binder clips (The kind used to hold papers in legal files.)
Need about 60.
- ✓ 3. One doz. 10 x 15 mailing envelopes
- ✓ 4. Mailing labels for above listed envelopes.
- ✓ 5. Box of paper clips
- ✓ 6. Full size ledger-type appointments calendar - ^{1/c}Not available in Greenwood
- ✓ 7. Roll of 13 cent stamps. - See Administrators rolling